

McGuireWoods LLP
201 North Tryon Street
Suite 3000
Charlotte, NC 28202-2146
Phone: 704.343.2000
Fax: 704.343.2300
www.mcguirewoods.com

Jasmine K. Gardner
Direct: 704.343.2262

McGUIREWOODS

jgardner@mcguirewoods.com

January 22, 2020

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk and Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Re: Rulemaking Proceeding for the Purpose of Promulgating a Regulation to Help Prevent the Potential for Misleading Advertisements by Prohibiting the Sale of Customer Data by Regulated Utilities Absent a Customer's Direct Consent (See Commission Order No. 2019-877)
Docket No. 2019-387-A

Dear Ms. Boyd:

Enclosed for filing please find a Petition to Intervene on behalf of Piedmont Natural Gas Company, Inc. in the above-referenced docket. By copy of this letter we are serving the same on the parties of record.

Thank you for your assistance with this matter. If you have any questions regarding this filing, you may reach me at the number shown above.

Sincerely,

/s/ Jasmine K. Gardner
Jasmine K. Gardner

JKG/sko

cc: All Parties of Record
ORS
Bruce Barkley
Pia Powers

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

Docket No. 2019-387-A

IN RE:

**Rulemaking Proceeding for the Purpose of)
Promulgating a Regulation to Help Prevent)
the Potential for Misleading)
Advertisements by Prohibiting the Sale of)
Customer Data by Regulated Utilities)
Absent a Customer's Direct Consent (See)
Commission Order No. 2019-877))
_____)**

**PETITION TO INTERVENE
OF PIEDMONT NATURAL GAS
COMPANY, INC.**

Piedmont Natural Gas Company, Inc. ("Piedmont") hereby files with the Public Service Commission of South Carolina ("Commission") this Petition, pursuant to S.C. Code Reg. 103-825, and other applicable provisions of the Commission's Rules of Practice and Procedure, for permission to intervene in the above-captioned proceeding.

In support of this Petition, Piedmont respectfully shows unto the Commission the following key facts:

1. It is respectfully requested that any notices or other communications with respect to this Petition be sent to:

Jasmine K. Gardner
McGuireWoods LLP
201 North Tryon Street, Suite 3000
Charlotte, North Carolina 28202
Telephone: (704) 343-2262
JGardner@mcguirewoods.com

2. Piedmont is a subsidiary of Duke Energy Corporation and is engaged in the business of transporting, distributing and selling natural gas in the states of South Carolina,

North Carolina and Tennessee. Piedmont is a public utility under the laws of this State, and its public utility operations in South Carolina are subject to the jurisdiction of this Commission.

3. By Petition dated November 27, 2019, the South Carolina Office of Regulatory Staff (“ORS”) filed a Petition for Rulemaking Proceeding with the Commission to determine appropriate parameters and standards regarding a utility’s use of customer data.

4. On December 18, 2019, in Docket 2019-367-A, the Commission issued Order No. 2019-877, in which it approved the ORS’s request to open a rulemaking proceeding for the purpose of promulgating a regulation to help prevent the potential for misleading advertisements by prohibiting the sale of customer data by regulated utilities, absent a customer’s direct consent. The Commission further ordered that this docket, 2019-387-A, be opened for the purpose of this rulemaking.

5. Piedmont has a substantial and material interest in the subject matter of the above-captioned proceeding, in that the outcome of this proceeding will directly impact Piedmont. As a public utility, Piedmont is subject to the regulatory authority of the Commission pursuant to Title 68 of the Code of Laws of South Carolina. Piedmont’s interests are directly affected by the outcome of this proceeding and cannot be adequately represented by any other party. Accordingly, Piedmont submits that good cause exists for the Commission to allow the Company to participate as a party in the above-captioned proceeding.

6. Piedmont has not developed a position in this matter, but reserves the right to modify, amend or expand any position the Company develops during the course of this proceeding.

WHEREFORE, Piedmont respectfully requests that the Commission issue an order granting: (i) the Company’s petition to intervene in this matter and participate fully in the Docket

and any hearing to be scheduled in this matter, (ii) Piedmont all rights attendant to intervenor status, including the right to be provided copies of all filings, pleadings, testimony, and exhibits, and (iii) such other and further relief as is just and proper.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted this 22nd day of January, 2020.

Piedmont Natural Gas Company, Inc.

/s/ Jasmine K. Gardner
Jasmine K. Gardner (S.C. Bar # 102168)
McGuireWoods LLP
201 North Tryon Street, Suite 3000
Charlotte, North Carolina 28202
Telephone: (704) 343-2262
JGardner@mcguirewoods.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached is being served this date upon all of the parties to this docket electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the addresses contained in the official service list in this proceeding.

This the 22nd day of January, 2020.

/s/ Sloane K. O'Hare
Sloane K. O'Hare